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June 6, 2023

VIA ECF ONLY

The Honorable Victor Marrero, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15B
New York, NY 10007

Re: Provenance NGC LLC v. Albright, No. 23-cv-00406-VM

Dear Judge Marrero:

This firm represents Plaintiff Provenance NGC LLC d/b/a/ Numismatic Guaranty Company (“Plaintiff”) in the above-referenced action (the “Action”). Pursuant to Section I.F of Your Honor’s Individual Practices, we write to request an extension of time to submit Plaintiff’s Amended Complaint to add a cause of action for violation of the Uniform Voidable Transactions Act and to add Patricia Albright as a party to the Action. *See* Dkt. No. 32 (May 23, 2023 Order granting Plaintiff’s request to amend its Complaint and to add Mrs. Albright as a party) (the “Order”).

While the Order did not specify the deadline to file the Amended Complaint, Plaintiff assumes it would be due either two weeks from the date of the Court’s Order (*i.e.*, June 6, 2023), or 30 days from the date of the Court’s Order (*i.e.*, June 22, 2023). Plaintiff respectfully requests a 30-day extension of the earlier June 6, 2023 deadline, until July 6, 2023. This is the first request for an extension of this deadline, and Defendant Richard Albright, through his counsel, consents to the extension. The requested extension of time will not impact any other scheduled dates.

Good cause exists for the requested extension, as the parties have been focusing their attention and resources on ongoing settlement discussions that they believe may resolve the dispute before it becomes necessary for Plaintiff to file its Amended Complaint, and such discussions were briefly stalled due to the recent holiday weekend.

We thank the Court for its time and attention to this matter.



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Respectfully Submitted,

/s/ Lindsay R. Edelstein

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cc: Counsel of Record (via ECF)